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March 18, 2020

BY CM/ECF

Hon. Paul G. Gardephe
Courtroom 705
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al.*, 18-cv-1781 (PGG)
Bifulco. et al, v. Nat'l Collegiate Student Loan Trust 2006-4, et al., 18-cv-7692 (PGG)

Dear Judge Gardephe:

We represent National Collegiate Student Loan Trusts 2007-2, 2007-3, 2006-4 and 2004-2 (the "Trust Defendants") in the above-referenced consolidated actions and write jointly on behalf of all parties to request an extension of the current fact discovery deadline of March 31, 2020.

The parties have been working to complete discovery by the March 31, 2020 deadline previously set by the Court. The parties are continuing to exchange document and written discovery in response to outstanding discovery requests. Moreover, nearly a dozen depositions are currently scheduled to take place before March 31, or are in the process of being scheduled.

However, given the precautions that have recently been put in place surrounding the Coronavirus disease (COVID-19), Defendants have proposed, and Plaintiffs have agreed to, an extension of fact discovery to postpone taking depositions. Already, two depositions of plaintiffs that were scheduled for March 9, 2020 and March 12, 2020 had to be postponed due to concerns that the witnesses may have been exposed to the Coronavirus disease (COVID-19). Further, counsel for Defendants Transworld Systems, Inc. and EGS Financial Care, Inc. are currently prohibited from traveling due to concerns surrounding the spread of COVID-19, and thus are unable to attend any of the scheduled depositions in person.

Accordingly, the parties request that the current fact discovery deadline be extended by approximately 60 days, through June 1, 2020, so that the parties may complete these depositions, as well as any additional written or document discovery that might follow. The parties also request that the pretrial conference currently scheduled for April 23, 2020, be adjourned to June 25, 2020. This is the fourth request for an extension of discovery in these actions.

The parties intend to continue moving forward to complete all outstanding discovery as quickly as practicable.

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A revised proposed amended Case Management and Scheduling Order is enclosed. Thank you for Your Honor's consideration of this request.

Respectfully,

/s/ Gregory T. Casamento

Gregory T. Casamento

cc: All counsel of record (by CM/ECF)